

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS DEXTER JAKES,

vs.

DUANE YOUNGBLOOD,

JOHN DOE 1,

JOHN DOE 2,

JOHN DOE 3,

JOHN DOE 4,

JOHN DOE 5,

JOHN DOE 6,

JOHN DOE 7,

JOHN DOE 8,

JOHN DOE 9, and

JOHN DOE 10,

Defendants.

Case No. 2:24-CV-1608-WSS

**DECLARATION OF DERRELLE
JANEY IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
MOTION TO DISMISS**

DERRELLE JANEY, being duly sworn, states as follows:

1. I am an attorney admitted to practice in the State of New York and admitted Pro Hac Vice in this matter on November 27, 2024, and a Partner at the Janey Law Firm P.C., attorney for Plaintiff Thomas Dexter Jakes in the above-captioned case. I submit this declaration in support of Plaintiff's opposition to defendant's motion to dismiss.

2. In particular, I make this declaration to transmit to this Court the **Expert Declaration of Nicholas G. Himonidis** offered by Plaintiff to authenticate the two podcast videos at issue in this case attached hereto as **Exhibit 28** and the authenticated videos as follows:

- a. **Exhibit 29:** ["10.28.24 Larry Reid Live INTERVIEWS Duane Youngblood: 'The Abused become the Abuser,'"](#)

- b. **Exhibit 30:** “11.3.24 – Pt. 2 – Larry Reid INTERVIEWS Duane Youngblood:
‘The Abused became The Abuser.’”

I declare under penalty of perjury that the foregoing is true and correct.

DATED: February 14, 2025

Respectfully Submitted,

By: /s/ Derrelle M. Janey

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